

1 David M. Given (SBN 142375)
2 Nicholas A. Carlin (SBN 112532)
3 PHILLIPS, ERLEWINE, GIVEN & CARLIN LLP
4 39 Mesa Street, Suite 201
5 The Presidio
6 San Francisco, CA 94129
7 Tel: 415-398-0900
8 Fax: 415-398-0911
9 Email: dmg@phillaw.com
10 nac@phillaw.com

11 James M. Wagstaffe (State Bar No. 95535)
12 Michael J. von Loewenfeldt (State Bar No. 178665)
13 Frank Busch (State Bar No. 258228)
14 KERR & WAGSTAFFE LLP
15 100 Spear Street, 18th Floor
16 San Francisco, CA 94105
17 Tel: 415-371-8500
18 Fax: 415-371-0500
19 Email: wagstaffe@kerrwagstaffe.com
20 myl@kerrwagstaffe.com
21 busch@kerrwagstaffe.com

22 Interim Co-Lead Counsel for Plaintiffs

23 UNITED STATES DISTRICT COURT
24 NORTHERN DISTRICT OF CALIFORNIA

25 NORTHERN DISTRICT OF CALIFORNIA
26 MARK OPPERMAN, et al.,

27 Plaintiffs,

28 v.

29 PATH, INC., et al.,

30 Defendants.

Case No. 13-cv-00453-JST

**DECLARATION OF MICHAEL VON
LOEWENFELDT IN SUPPORT OF
MOTION FOR ATTORNEYS' FEES,
ETC.**

THIS MOTION RELATES TO:

Opperman v. Path, Inc., No. 13-cv-453-JST
Hernandez v. Path, Inc., No. 12-cv-1515-JST

1 I, Michael von Loewenfeldt, declare as follows:

2 1. I am an attorney licensed to practice before all of the courts in California. I am a
3 partner in the law firm of Kerr & Wagstaffe LLP (“KW”), which serves as Plaintiffs’ co-lead
4 counsel in the above-entitled putative class action lawsuit filed in this Court against Path, Inc., et
5 al. (Case No. 13-cv-00453-JST) and Related Actions. I submit this declaration in support of
6 the accompanying Motion for Attorneys’ Fees, Litigation Costs, and Incentive Awards. The
7 facts set forth herein are based upon my personal knowledge and, if called upon, I could and
8 would competently testify thereto.

9 2. I am the lawyer at my firm with principal responsibility for this matter. After the
10 various cases were related and assigned, the Court ordered an organization of plaintiffs’ counsel
11 with our firm serving as co-lead, together with a Plaintiffs’ Steering Committee that came to
12 include the other co-lead counsel (Phillips, Erlewine, Given & Carlin LLP) and three other law
13 firms. My firm has worked on this matter continuously since that time, and my firm and I have
14 devoted considerable time and resources to this matter and have been centrally involved in every
15 aspect of the proceedings before this Court.

16 3. Kerr & Wagstaffe LLP has extensive experience with insurance law, unfair
17 competition, and class action litigation. I graduated Phi Beta Kappa from San Diego State
18 University in 1991 with a B.A. in Political Science. I received my J.D. from the University of
19 California at Berkeley (Boalt Hall) in 1995 and was made a member of the Order of the Coif.
20 After law school, I served as a law clerk to the Honorable Sandra B. Armstrong, United States
21 District Court for the Northern District of California.

22 4. I have substantial experience in consumer, employment, and class action
23 litigation. I have represented both plaintiffs and defendants in class actions in California and
24 other jurisdictions in the United States. I have represented certified plaintiffs’ classes in:

25 • Alexander v. Farmers Insurance Company, Inc., Superior Court of California,
26 County of Los Angeles, BC460992, a consumer rights class action involving depreciation taken
27 on personal property items under homeowners insurance policies, which settled on terms that
28 were approved by the Los Angeles County Superior Court;

1 • Benson et al. v. Bella Enterprises, Ltd. et al, Superior Court of California, County
2 of Santa Clara, 110CV165035, a wage and hour class action which settled on terms that were
3 approved by the Santa Clara Superior Court;

4 • Bhatnagar et al. v. Catalina Restaurant Group, Inc., Superior Court of California,
5 County of Alameda, RG 05246009, a wage and hour class action which settled on terms that
6 were approved by the Alameda County Superior Court;

7 • De La Cruz et al. v. California Pizza Kitchen, Inc., Superior Court of California,
8 County of San Francisco, CGC-07-462843, a wage and hour class action which settled on terms
9 that were approved by the San Francisco County Superior Court;

10 • Diapo v. Flight Centre USA, Inc., United States District Court for the Central
11 District of California case number CV 09-4790 PSG, a wage and hour class action which settled
12 on terms that were approved by the United States District Court;

13 • Finley v. Wells Fargo Financial Acceptance California, Inc., Superior Court of
14 California, County of Los Angeles (Central District), BC 331174, a wage and hour class action
15 which settled on terms that were approved by the Los Angeles County Superior Court;

16 • Forestiere v. West Coast Life Ins. Co., Superior Court of California, County of
17 San Francisco CGC 01-402340, a consumer rights class action involving the purchase of life
18 insurance policies, which settled on terms that were approved by the San Francisco County
19 Superior Court;

20 • In re Prudential Insurance Company of America SGLI/VGLI Contract Litigation,
21 United States District Court for the District of Massachusetts master case number 3:11-md-
22 2208-MAP, four consolidated MDL matters involving military life insurance where I was co-
23 lead counsel and MDL liaison counsel. The matter settled on terms that were approved by the
24 United States District Court;

25 • Kirkwood v. California State Automobile Association Inter-Insurance Bureau,
26 Superior Court of California, County of San Francisco CGC-09-48919, a consumer rights class
27 action involving depreciation taken on personal property items under homeowners insurance
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1 policies, which settled on terms that were approved by the San Francisco County Superior
2 Court;

3 • Knight v. Red Door Salons, United States District Court for the Northern District
4 of California case number C-08-1520 SC, a wage and hour class action which settled on terms
5 that were approved by this Court;

6 • McCardle v. 24 Hour Fitness, Superior Court of California, County of Alameda,
7 RG08414888, a consumer rights class action involving access to various levels of gyms at 24
8 Hour Fitness, which settled on terms that were approved by the Alameda County Superior
9 Court;

10 • Mullholland v. Cozza, Superior Court of California, County of San Francisco,
11 CGC 07-468443, a wage and hour class action which settled on terms that were approved by the
12 San Francisco County Superior Court;

13 • Radford v. HFS North America LLC, Superior Court of California, County of
14 Alameda, RG 06296440, a wage and hour class action which settled on terms that were
15 approved by the Alameda County Superior Court;

16 • Scher et al. v. California Physicians' Service, Superior Court of California,
17 County of San Francisco, CGC 08-481431, a consumer rights/health insurance class action
18 which settled on terms that were approved by the San Francisco County Superior Court;

19 • Topper and Molina v. RedWing Shoe Company, Inc., Superior Court of
20 California, County of Alameda, RG 06256269, a wage and hour class action which settled on
21 terms that were approved by the Alameda County Superior Court;

22 • Venegas et al. v. Apria Health Care, Inc., Superior Court of California, County of
23 San Francisco, CGC 06-449669, a wage and hour class action which settled on terms that were
24 approved by the San Francisco County Superior Court;

25 • Weir v. 24 Hour Fitness, Superior Court of California, County of San Francisco,
26 CGC-05-438478, a consumer rights class action involving 1.8 million Class Members which
27 settled on terms that were approved by the San Francisco County Superior Court;
28

1 • Williams v. LA Fitness, Superior Court of California, County of Los Angeles,
2 BC385623, a consumer rights class action which settled on terms that were approved by the Los
3 Angeles County Superior Court.

4 5. On or about March 30, 2017, Plaintiffs, on behalf of themselves and all
5 Settlement Class Members (as defined), entered into a Class Action Settlement Agreement (the
6 “Settlement Agreement”), a true and correct copy of which Plaintiffs have filed with the Court
7 (ECF No. 884), resolving the above-captioned action(s) against Defendants Foodspotting, Inc.
8 (“Foodspotting”), Foursquare Labs, Inc. (“Foursquare”), Gowalla, Inc. (“Gowalla”), Instagram,
9 LLC (“Instagram”), Kik Interactive, Inc. (“Kik”), Path, Inc. (“Path”), Twitter, Inc. (“Twitter”)
10 and Yelp! Inc. (“Yelp”) (collectively, the “App Defendants”).

11 6. On July 6, 2017, the Court granted preliminary approval of the Settlement
12 Agreement (ECF No. 894). As the Court noted, the Settlement Agreement was the product of
13 protracted and highly adversarial litigation, spanning over five years and reflected in the case’s
14 procedural history, together with extensive and complex settlement negotiations between and
15 among the parties and their experienced and informed counsel. Included in those negotiations
16 was the involvement of a neutral third-party mediator, the Honorable William J. Cahill (Ret.),
17 from JAMS.

18 7. The Settlement Agreement is the product of protracted and highly adversarial
19 litigation, spanning five years and reflected in the case’s procedural history before the Court
20 (reviewed in the accompanying Memorandum), together with extensive and complex settlement
21 negotiations between and among the parties and their experienced and informed counsel.
22 Included in those negotiations was the involvement of a neutral third-party mediator, the
23 Honorable William J. Cahill (Ret.), from JAMS.

24 8. During the course of this lawsuit, KW’s attorneys endeavored to zealously
25 represent the interests of Plaintiffs and Settlement Class Members in this action. We devoted
26 substantial resources to prosecuting this case on Plaintiffs’ and Settlement Class Members’
27 behalf. For a law firm of our size, the commitment to this case was substantial.
28

1 9. KW's work in this case included formulating the legal basis for Plaintiffs' and
2 the Class Members' claims; analyzing relevant facts and other circumstances giving rise to these
3 claims; conceiving a class-wide basis for asserting such claims and the class-wide damages
4 arising therefrom; meeting with and interviewing class plaintiffs; discussing these claims with
5 privacy experts and other professionals; supervising and managing the drafting of several
6 versions of the operative pleading in the case; opposing serial motions to dismiss and for
7 summary judgment directed at some or all of the claims asserted against the App Defendants in
8 the case; assisting with discovery relating to the invasion of privacy claims against the App
9 Defendants; preparing for and attending depositions; reviewing and analyzing the thousands of
10 pages of documents produced by the App Defendants in the case; supervising and managing the
11 answering of hundreds of written discovery requests propounded by the App Defendants to each
12 Plaintiff; conferring with clients and co-counsel on the administration and management of this
13 case; conferring with consulting and testifying experts; preparing the class certification motions
14 against the App Defendants; preparing the motion for preliminary approval of the Settlement
15 Agreement; arguing motions and otherwise litigating before the Court; appearing and reporting
16 to the Court on a periodic basis; and participating in settlement negotiations and drafting of the
17 settlement agreement.

18 10. In addition, following this Court's preliminary approval of the Settlement
19 Agreement, I have been involved in communicating with counsel on post-settlement issues as
20 they arose, as well as in communicating with class members and the Claims Administrator about
21 notice and administration issues as well as about Settlement Class Members' inquiries on the
22 terms and conditions of the Settlement Agreement and its impact and application on their rights.

23 11. Throughout this litigation, I have endeavored with my colleagues among the
24 Plaintiffs' Steering Committee to divide and manage tasks among personnel in our and other
25 firms, to prevent duplication of effort and to effectively and cost-efficiently represent the Class
26 in this matter. My law firm's time and expenses benefitted the Class, and, as such, my law firm
27 should be compensated for its work on the Class' behalf.
28

1 12. In accordance with the court-ordered guidelines in this case (ECF No. 433-1), the
2 Court has received confidential quarterly reports of time spent by the law firms serving on the
3 Plaintiffs' Steering Committee as reported to co-lead counsel, detailed by attorney and category
4 of task. Because not all of the time spent on this action relates to the settled claims, I have used
5 the same contemporaneous billing records to prepare the attached Exhibit A which sets forth our
6 firm's work, by task and time keeper, as it relates to the claims against the App Defendants only,
7 and the hourly rates for our law firm's attorneys and staff, for the period from September 9,
8 2013 through September 8, 2017.

9 13. At the inception of our role in this matter, our law firm's bookkeeper created
10 separate billing accounts for each defendant in this action and I directed that firm personnel
11 record time based upon the specific tasks assigned to them by defendant where possible. Our
12 law firm also maintained an "App Defendant" billing account which tracked time spent by firm
13 personnel for catch-all work done to collectively advance the privacy claims against the App
14 Defendants, and a "All Defendants" account for time attributed to all of the claims. A separate
15 "Apple" account was created for time solely related to the misrepresentation claims against
16 Apple. The time reported here includes all time for the App Defendants together with the "App
17 Defendant" account is reported here, less time spent on claims against the previously dismissed
18 defendants who are not parties to the Settlement Agreement. It also includes time for tasks that
19 were applicable to all claims, reduced by one-third to account for the unresolved claims against
20 Apple (although in my professional opinion the same time would likely have been spent even if
21 Apple had never been a defendant).

22 14. The report contained in Exhibit A indicates a total lodestar of \$1,177,228.33,
23 reflecting a total of 2,547.6 hours for that matter – working out to about \$462/hour in gross –
24 over a more than four-year period. This summary was prepared from contemporaneous daily
25 time records reflecting the rates of KW attorneys and paralegals, based on detailed reports by
26 task of daily activities in the matter which, in addition to the reduction for the catch-all account,
27 I adjusted downward from actual time reported based upon billing judgment similar to that I
28 exercise in the normal course of our law firm's hourly practice. I have also eliminated entirely

1 all time recorded by twelve individuals who, at some point in the last four years, spent less than
2 15 hours on this case to avoid any learning curve duplication from these individuals who
3 stepped in to help on individual projects, also consistent with our firm's hourly billing practice.

4 15. The reported time does not include additional time spent preparing this motion
5 and its related papers, the upcoming final approval motion, continuing to communicate with
6 class members and the administrator, and other tasks that will be necessary to see this settlement
7 through completion. Based on prior experience in such cases, I estimate that approximately 80-
8 100 hours of time will be required in the future, primarily split between myself, James
9 Wagstaffe, Frank Busch, and a paralegal. Given that the lodestar to date is already far in excess
10 of the requested fee, we will not supplement with the specific time unless requested to do so by
11 the Court.

12 16. The aforementioned summary reflects the following: 444 hours of my time (J.D.,
13 U.C. Berkeley School of Law (Boalt) '95) devoted to this matter at a rate of \$700 per hour; 292
14 hours of my law partner James Wagstaffe's time (J.D., Hastings Law '80) devoted to this matter
15 at a rate of \$800 per hour; 139 hours of my former law partner Michael Ng (J.D., Harvard Law
16 '01) devoted to this matter at a rate of \$650.00 per hour; 452 hours of my associate Frank Busch
17 (J.D., U. Chicago Law '08) devoted to this matter at a rate of \$450 per hour; 104 hours of my
18 associate Daniel Veroff (J.D., Hastings Law '13) devoted to this matter at a rate of \$350 per
19 hour; 297 hours of my former associate Julie Stockton (J.D., Hastings Law '12) devoted to this
20 matter at a rate of \$350 per hour; 362 hours of my former associate Daniel Zarchy (J.D.,
21 Hastings Law '15) devoted to this matter at a rate of \$295 per hour; and, collectively, 457 hours
22 of paralegal time devoted to this matter at a rate of \$200 per hour.

23 17. As described below and reflected in Exhibit A, KW's time working on this
24 matter as co-lead counsel breaks down by task into the following major categories (as further
25 broken down in Exhibit A):

26 A. Attorney Meetings/Strategy (416 hours): Preparation and multiple in-
27 person meetings and telephone conferences of one or more attorneys or paralegals from this law
28 firm with other Plaintiffs' counsel, consulting and potential testifying privacy, damages and

1 source code experts as well as meetings among attorneys from this law firm to consider case
2 management and settlement strategy at every phase and in every aspect of the case over its over
3 four-year life, together with multiple and extensive written communications and memoranda on
4 the same subjects.

5 B. Case and File Management (106 hours): Organization of file and client
6 and case documents, pleadings, discovery, etc., by one or more attorneys and (mostly)
7 paralegals from this law firm, including both physical and digital file and database management.

8 C. Client Communications and Meetings (90 hours): Preparation for and
9 multiple in-person meetings and telephone conferences and/or email exchanges between and
10 among one or more attorneys from this law firm and Plaintiffs and other counsel to discuss
11 various matters relating to the case and its progress, discovery subjects and deposition
12 preparation, the status of settlement negotiations and the impact and application of the proposed
13 Settlement Agreement in this action on Settlement Class Members' rights.

14 D. Research, Motion Work, and Court Appearances (1,197 hours): Legal
15 and factual research conducted by one or more attorneys from this law firm in connection with
16 the litigation and the preparation of pleadings and papers filed with the Court on both merits and
17 class certification subjects, related court appearances, together with communications and
18 memoranda on various subjects, as well as similar work during all phases and every aspect of
19 the case, and communicating the results of said research with interested parties and counsel.

20 E. Discovery (397 hours: Work performed by one or more attorneys and
21 paralegals from this law firm in supervising and managing all aspects of offensive and defensive
22 discovery for Plaintiffs and Class Members, meeting and conferring with App Defendants'
23 counsel regarding multiple discovery disputes and researching and drafting letters for
24 submission to the Court regarding said disputes, managing and reviewing thousands of pages of
25 documents produced by the App Defendants bearing on both merits and class certification
26 issues, attending percipient and expert depositions, and all preparation in connection therewith.
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1 F. Settlement (258 hours): Work by one or more attorneys from this law
2 firm in connection with preparation and participation in mediation process, including
3 preparation of mediation briefs and confidential communications to the mediator, multiple in-
4 person meetings and telephone conferences with Judge Cahill and opposing counsel, as well as
5 review and analysis of additional user data from the App Defendants, and the drafting of
6 multiple iterations and completion of settlement documentation and communications with
7 Plaintiffs' Steering Committee, opposing counsel and Plaintiffs on same, and working with the
8 settlement administrator on notice and class member issues.

9 18. The above task-based summary of time constitutes our law firm's best estimate
10 of the allocation of time by task based upon the descriptions by each timekeeper contained in
11 those records for work done in connection with the claims against the App Defendants.

12 **EXPENSES**

13 19. In accordance with the court-ordered guidelines in this case (ECF No. 433-1),
14 this firm opened and administered a Steering Committee fund to handle certain major expenses
15 in this action. All class counsel advanced funds for use in this manner. A total of \$149,036 in
16 expenses were incurred from that fund for matters related to the claims against the App
17 Defendants. Attached hereto as Exhibit B is a summary report of those expenses prepared by
18 this law firm's bookkeeper. All of these are expenses that would either be billed to an hourly
19 client or which an hourly client would have been required to pay directly.

20 20. In addition, as previously reported to the Court, this firm and the other firms on
21 the PSC have incurred expenses not paid from the Steering Committee Fund. Those expenses
22 exceed \$200,000, and at least half of them are fairly attributable to the claims settled against the
23 App Defendants. Given that the Steering Committee Fund alone captures all but \$1,000 of the
24 requested expenses, we have not detailed the excess expenses, but can certainly do so if
25 requested by the Court. For example, this firm incurred nearly \$28,000 in expenses for storage
26 and other services related to the ESI exchanged in discovery, over \$8,000 on Westlaw expenses,
27 and over \$1,500 on conference call services with the PSC over the last four years. The
28

1 requested \$150,000 expenses reimbursement thus falls far short of fully compensating counsel
2 for the costs advanced on these claims.

3 I declare under penalty of perjury under the laws of the State of California and the
4 United States of America that the foregoing is true and correct.

5 Executed this 22nd day of September 2017 at San Francisco, California.

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/s/ Michael von Loewenfeldt
Michael von Loewenfeldt

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EXHIBIT A

	Partner	Associate	Paralegal	Total
Attorney Mtg/Strategy	263.6	146.1	6.4	416.1
Court Appearance/Prep	60.6	68.8	7.6	137.0
Client Comm./Mtg	50.1	22.7	17.5	90.3
Draft Discovery Reqs/Resps	36.3	55.5	2.6	94.4
Deposition Prep	0.5	60.7	-	61.1
Deposition - Take or Defend	57.2	20.1	15.0	92.3
Doc. Production/Review	2.9	32.3	113.2	148.3
Experts - Work or Consult	-	1.2	-	1.2
Rule 12 Mots- Research/Briefs	87.4	80.2	3.9	171.5
Class Cert. Research Briefs	52.4	82.7	-	135.1
Dispositive Mots Research/Briefs	31.5	187.7	79.7	298.9
Other Research/Briefing	36.2	330.7	85.7	452.6
Settlement	182.9	75.2	-	258.1
Case Management/File Maintenance	7.1	19.1	80.2	106.4
Appeal	-	1.5	-	1.5
Misc.	7.2	30.4	44.2	81.8
TOTAL	875.8	1,214.8	456.0	2,546.6

	Type	Rate	Hours	Lodestar
Julie Stockton	Associate	350	296.6	\$ 103,810.00
Daniel Veroff	Associate	350	103.9	\$ 36,376.67
Daniel Zarchy	Associate	295	362.3	\$ 106,888.33
Frank Busch	Associate	450	451.9	\$ 203,370.00
James Wagstaffe	Partner	800	292.6	\$ 234,080.00
Michael Ng	Partner	650	139.1	\$ 90,393.33
Michael von Loewenfeldt	Partner	700	444.2	\$ 310,916.67
Paralegals		200	457.0	\$ 91,393.33
TOTAL			2547.6	\$ 1,177,228.33

EXHIBIT B

Opperman/Apple Expenses re App Developers

Date	Note	Check No.	Amount	Running Total
	Checks Ordered		57.06	0.00
7/25/2014	Strange and Carpenter deposition transcripts - Carter	1001	1,821.90	57.06
7/23/2015	Phillips, Erlewine, Given & Carlin Attendance at hearing on related case (Sterk v. Path)	1002	214.75	1,878.96
9/21/2015	JAMS, Inc. mediation	1003	4,275.00	2,093.71
2/19/2016	Interhack Corporation Technical evaluation of iPhones per Court order	1004	2,000.00	6,368.71
3/21/2016	First Legal Deposition Services deposition transcripts - Carter, Cooley, Green	1005	5,567.90	8,368.71
3/30/2016	LDiscovery, LLC iPhone imaging and extraction	1006	5,625.00	13,936.61
4/20/2016	Fishkind & Associates, Inc Economic analysis in support of Path certification	1007	5,000.00	19,561.61
4/27/2016	Interhack Corporation Technical evaluation of iPhones per Court order	1008	1,105.00	24,561.61
5/4/2016	LDiscovery, LLC iPhone imaging and extraction	1009	52.87	25,666.61
5/9/2016	Interhack Corporation Technical evaluation of iPhones per Court order	1010	6,000.00	25,719.48
5/9/2016	Harry Chomsky Expert analysis of app code	1011	2,730.00	31,719.48
6/1/2016	LDiscovery, LLC iPhone imaging and extraction	1012	250.00	34,449.48
6/2/2016	Fishkind & Associates, Inc Economic analysis in support of Path certification	1013	11,250.00	34,699.48
6/3/2016	Harry Chomsky Expert analysis of app code	1014	910.00	45,949.48
6/15/2016	Nirali Mandalaywala reimburse phone	1015	941.76	46,859.48
6/15/2016	Claire Moses reimburse phone	1016	955.92	47,801.24
6/15/2016	Fishkind & Associates, Inc Economic analysis in support of Path certification	1017	15,830.35	48,757.16
6/24/2016	Lydia Zinn court transcript re Class Certification hearing	1018	135.75	64,587.51
6/28/2016	LDiscovery, LLC iPhone imaging and extraction	1019	1,375.00	64,723.26
6/28/2016	Arno Puder Expert analysis of app code	1020	10,300.00	66,098.26
7/18/2016	Claire Moses reimburse travel for deposition	1022	554.17	76,398.26
7/18/2016	Gentry Hoffman reimburse phone	1023	960.27	76,952.43
7/19/2016	Aptus Court Reporting deposition transcripts (Puder)	1024	706.53	77,912.70
7/27/2016	LDiscovery, LLC iPhone imaging and extraction	1025	1,312.50	78,619.23
8/1/2016	Arno Puder Expert analysis of app code	1026	13,000.00	79,931.73
8/8/2016	Harry Chomsky Expert analysis of app code	1027	280.00	92,931.73
8/8/2016	First Legal Deposition Services deposition transcripts (Varner)	1028	1,478.90	93,211.73
8/25/2016	Fishkind & Associates, Inc Expert analysis of app code	1029	8,837.95	94,690.63
9/1/2016	Interhack Corporation Technical evaluation of iPhones per Court order	1030	1,103.50	103,528.58
9/12/2016	First Legal Deposition Services deposition transcripts (Hoffman, Beuershausen, Dean)	1031	8,514.95	104,632.08
10/4/2016	U.S. Legal Support deposition transcripts (White)	1032	978.75	113,147.03
10/4/2016	LDiscovery, LLC iPhone imaging and extraction	1033	250.00	114,125.78
10/21/2016	Gardy & Notis deposition transcripts (Pirozzi)	1034	713.15	114,375.78
10/21/2016	Phillips, Erlewine, Given & Carlin Code review software and hearing transcripts	1035	368.90	115,088.93
10/21/2016	Fishkind & Associates, Inc Economic analysis and deposition costs in support of F	1036	6,300.00	115,457.83
10/21/2016	Network Deposition Services, Inc deposition transcripts (Cooley II, Green, II)	1037	2,269.60	121,757.83
10/21/2016	First Legal Deposition Services deposition transcripts (Cooley, Green, Mandalaywala,	1038	15,579.33	124,027.43
10/25/2016	JAMS, Inc. mediation	1039	1,878.58	139,606.76
11/14/2016	JAMS, Inc. mediation	1040	3,652.14	141,485.34
11/14/2016	LDiscovery, LLC iPhone imaging and extraction	1041	250.00	145,137.48
1/20/2017	JAMS, Inc. mediation	1044	2,352.00	145,387.48
3/29/2017	Steve Dean travel expenses for deposition	1046	1,296.60	147,739.48
				149,036.08